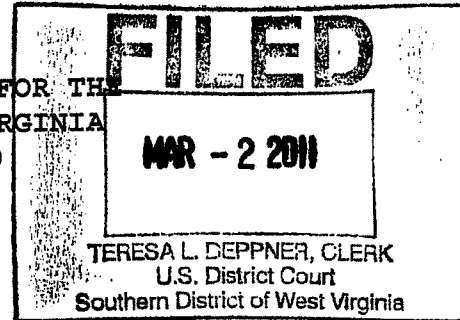


UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
BECKLEY GRAND JURY 2010
MARCH 1, 2011 SESSION



UNITED STATES OF AMERICA

SEALED

v.

CRIMINAL NO.

3:11-00074

18 U.S.C. § 371

18 U.S.C. § 2342(a)

18 U.S.C. § 2

21 U.S.C. § 841(a)(1)

BASIM ALI TALOUZI
NICOLE DIANNE BLANKENSHIP
NASSER SAID SALEH,
also known as "Nasser Said Daher"
JAMAL ADIL MAKHLOUF
FODIE MANDA KOITA
YAHYA WILLIA

I N D I C T M E N T

The Grand Jury Charges:

COUNT ONE

(Conspiracy)

1. From in or about July 2010 until in or about January 2011, at or near Huntington, Cabell County, West Virginia, within the Southern District of West Virginia and elsewhere, defendants BASIM ALI TALOUZI, NICOLE DIANNE BLANKENSHIP, NASSER SAID SALEH, also known as "Nasser Said Daher," JAMAL ADIL MAKHLOUF, FODIE MANDA KOITA and YAHYA WILLIA and others both known and unknown to the grand jury, did knowingly conspire to commit offenses against the United States in violation of 18 U.S.C. § 2342(a), that is, to knowingly transport, receive, possess, purchase and sell contraband cigarettes, as that term is defined in 18 U.S.C., § 2341, to wit,

approximately 3,182,400 cigarettes which bore no evidence of the payment of applicable state cigarette taxes in the State of West Virginia.

Object of the Conspiracy

2. It was the object of the conspiracy for defendants BASIM ALI TALOUZI, NICOLE DIANNE BLANKENSHIP, NASSER SAID SALEH, also known as "Nasser Said Daher", JAMAL ADIL MAKHLOUF, FODIE MANDA KOITA and YAHYA WILLIA and others both known and unknown to the grand jury to enrich themselves by purchasing contraband cigarettes represented to them to be stolen cigarettes at below market value and reselling them in other jurisdictions for significant profit.

Overt Acts in Furtherance of the Conspiracy

3. In furtherance of the conspiracy and to affect the object of the conspiracy, the following overt acts were committed:

a. On or about August 27, 2010 defendant BASIM ALI TALOUZI traveled from at or near Charleston, West Virginia to Burbank, Illinois to facilitate the delivery of approximately 120,000 contraband cigarettes.

b. On or about September 14, 2010 defendant NASSER SAID SALEH, also known as "Nasser Said Daher" transported approximately 120,000 contraband cigarettes from at or near South Charleston, West Virginia to the State of Virginia.

c. On or about October 5, 2010 defendant BASIM ALI TALOUZI transported approximately 200,000 contraband cigarettes from 917

20th Street, Huntington, West Virginia to a parking lot located at the corner of 9th Avenue and 20th Street in Huntington, West Virginia.

d. On or about October 7, 2010 defendant NICOLE DIANNE BLANKENSHIP transported approximately 106,000 contraband cigarettes from 917 20th Street, Huntington, West Virginia to a location on Hal Greer Boulevard in Huntington, West Virginia.

e. On or about October 22, 2010 defendant BASIM ALI TALOUZI transported approximately 200,000 contraband cigarettes from 917 20th Street, Huntington, West Virginia to an unknown location.

f. On or about October 28, 2010 defendant BASIM ALI TALOUZI transported approximately 144,000 contraband cigarettes from 917 20th Street, Huntington, West Virginia to 3080 16th Street, Huntington, West Virginia.

g. On or about November 3, 2010 defendant BASIM ALI TALOUZI transported approximately 200,000 contraband cigarettes from 917 20th Street, Huntington, West Virginia to an unknown location.

h. On or about November 9, 2010 defendant NICOLE DIANNE BLANKENSHIP transported approximately 200,000 contraband cigarettes from 917 20th Street, Huntington, West Virginia to an unknown location.

i. On or about November 19, 2010 defendant BASIM ALI TALOUZI transported approximately 240,400 contraband cigarettes from 917 20th Street, Huntington, West Virginia to an unknown location.

j. On or about November 26, 2010 defendant BASIM ALI TALOUZI transported approximately 201,000 contraband cigarettes from 917 20th Street, Huntington, West Virginia to 3080 16th Street, Huntington, West Virginia.

k. On or about November 30, 2010 defendant BASIM ALI TALOUZI transported approximately 178,000 contraband cigarettes from 917 20th Street, Huntington, West Virginia to a location on 16th Street, Huntington, West Virginia.

l. On or about December 2, 2010 defendant BASIM ALI TALOUZI transported approximately 180,000 contraband cigarettes from 917 20th Street, Huntington, West Virginia to a Marathon Oil Company Service Station located at 1353 Madison Avenue, Huntington, West Virginia.

m. On or about December 6, 2010 defendant NICOLE DIANNE BLANKENSHIP transported approximately 228,000 contraband cigarettes from 917 20th Street, Huntington, West Virginia to an unknown location.

n. On or about December 10, 2010 defendant NICOLE DIANNE BLANKENSHIP transported approximately 133,000 contraband cigarettes from 917 20th Street, Huntington, West Virginia to 1445 16th Street, Huntington, West Virginia.

o. On or about December 20, 2010 defendant BASIM ALI TALOUZI transported approximately 288,000 contraband cigarettes from 917

20th Street, Huntington, West Virginia to 3080 16th Street, Huntington, West Virginia.

p. On or about December 29, 2010 defendant NICOLE DIANNE BLANKENSHIP transported approximately 204,000 contraband cigarettes from 917 20th Street, Huntington, West Virginia to 121 Kinetic Drive, Huntington, West Virginia.

q. On or about January 5, 2011 defendant NICOLE DIANNE BLANKENSHIP transported approximately 180,000 contraband cigarettes from 917 20th Street, Huntington, West Virginia to 121 Kinetic Drive, Huntington, West Virginia.

In violation of Title 18, United States Code, Sections 371.

COUNT TWO

On or about August 27, 2010 at or near Huntington, Cabell County, West Virginia, within the Southern District of West Virginia and elsewhere, defendants BASIM ALI TALOUZI, NICOLE DIANNE BLANKENSHIP, and JAMAL ADIL MAKHLOUF, aided and abetted by each other and by persons both known and unknown to the grand jury, did knowingly transport, receive, possess, purchase and cause the transportation, receipt, possession and purchase of contraband cigarettes as that term is defined in 18 U.S.C., § 2341, to wit, a quantity of 120,000 cigarettes which bore no evidence of the payment of applicable state cigarette taxes in the State of West Virginia.

In violation of Title 18, United States Code, Sections 2342(a) and 2.

COUNT THREE

On or about September 14, 2010 at or near South Charleston, Kanawha County, West Virginia, within the Southern District of West Virginia, and elsewhere defendants NASSER SAID SALEH, also known as "Nasser Said Daher" and BASIM ALI TALOUZI aided and abetted by each other and by persons both known and unknown to the grand jury did knowingly transport, receive, possess and purchase contraband cigarettes, as that term is defined in 18 U.S.C. § 2341 to wit, approximately 120,000 cigarettes which bore no evidence of the payment of applicable state cigarette taxes in the State of West Virginia.

In violation of Title 18, United States Code, Sections 2342(a) and 2.

COUNT FOUR

On or about October 5, 2010 at or near Huntington, Cabell County, West Virginia, within the Southern District of West Virginia and elsewhere, defendants NASSER SAID SALEH, also known as "Nasser Said Daher" and BASIM ALI TALOUZI aided and abetted by each other and by persons both known and unknown to the grand jury did knowingly transport, receive, possess and purchase contraband cigarettes, as that term is defined in 18 U.S.C. § 2341 to wit, approximately 200,000 cigarettes which bore no evidence of the payment of applicable state cigarette taxes in the State of West Virginia.

In violation of Title 18, United States Code, Sections 2342(a) and 2.

COUNT FIVE

On or about October 7, 2010 at or near Huntington, Cabell County, West Virginia, within the Southern District of West Virginia and elsewhere, defendants NASSER SAID SALEH, also known as "Nasser Said Daher", BASIM ALI TALOUZI and NICOLE DIANNE BLANKENSHIP aided and abetted by each other and by persons both known and unknown to the grand jury did knowingly transport, receive, possess and purchase contraband cigarettes, as that term is defined in 18 U.S.C. § 2341 to wit, approximately 106,000 cigarettes which bore no evidence of the payment of applicable state cigarette taxes in the State of West Virginia.

In violation of Title 18, United States Code, Sections 2342(a) and 2.

COUNT SIX

On or about October 22, 2010 at or near Huntington, Cabell County, West Virginia, within the Southern District of West Virginia and elsewhere, defendants NASSER SAID SALEH, also known as "Nasser Said Daher" and BASIM ALI TALOUZI aided and abetted by each other and by persons both known and unknown to the grand jury did knowingly transport, receive, possess and purchase contraband cigarettes, as that term is defined in 18 U.S.C. § 2341 to wit, approximately 200,000 cigarettes which bore no evidence of the payment of applicable state cigarette taxes in the State of West Virginia.

In violation of Title 18, United States Code, Sections 2342(a) and 2.

COUNT SEVEN

On or about October 28, 2010 at or near Huntington, Cabell County, West Virginia, within the Southern District of West Virginia and elsewhere, defendants NASSER SAID SALEH, also known as "Nasser Said Daher" and BASIM ALI TALOUZI aided and abetted by each other and by persons both known and unknown to the grand jury did knowingly transport, receive, possess and purchase contraband cigarettes, as that term is defined in 18 U.S.C. § 2341 to wit, approximately 144,000 cigarettes which bore no evidence of the payment of applicable state cigarette taxes in the State of West Virginia.

In violation of Title 18, United States Code, Sections 2342(a) and 2.

COUNT EIGHT

On or about November 3, 2010 at or near Huntington, Cabell County, West Virginia, within the Southern District of West Virginia and elsewhere, defendants NASSER SAID SALEH, also known as "Nasser Said Daher" and BASIM ALI TALOUZI aided and abetted by each other and by persons both known and unknown to the grand jury did knowingly transport, receive, possess and purchase contraband cigarettes, as that term is defined in 18 U.S.C. § 2341 to wit, approximately 200,000 cigarettes which bore no evidence of the payment of applicable state cigarette taxes in the State of West Virginia.

In violation of Title 18, United States Code, Sections 2342(a) and 2.

COUNT NINE

On or about November 9, 2010 at or near Huntington, Cabell County, West Virginia, within the Southern District of West Virginia and elsewhere, defendants NASSER SAID SALEH, also known as "Nasser Said Daher", BASIM ALI TALOUZI and NICOLE DIANNE BLANKENSHIP aided and abetted by each other and by persons both known and unknown to the grand jury did knowingly transport, receive, possess and purchase contraband cigarettes, as that term is defined in 18 U.S.C. § 2341 to wit, approximately 200,000 cigarettes which bore no evidence of the payment of applicable state cigarette taxes in the State of West Virginia.

In violation of Title 18, United States Code, Sections 2342(a) and 2.

COUNT TEN

On or about November 19, 2010 at or near Huntington, Cabell County, West Virginia, within the Southern District of West Virginia and elsewhere, defendants NASSER SAID SALEH, also known as "Nasser Said Daher" and BASIM ALI TALOUZI aided and abetted by each other and by persons both known and unknown to the grand jury did knowingly transport, receive, possess and purchase contraband cigarettes, as that term is defined in 18 U.S.C. § 2341 to wit, approximately 240,400 cigarettes which bore no evidence of the payment of applicable state cigarette taxes in the State of West Virginia.

In violation of Title 18, United States Code, Sections 2342(a) and 2.

COUNT ELEVEN

On or about November 26, 2010 at or near Huntington, Cabell County, West Virginia, within the Southern District of West Virginia and elsewhere, defendants NASSER SAID SALEH, also known as "Nasser Said Daher" and BASIM ALI TALOUZI aided and abetted by each other and by persons both known and unknown to the grand jury did knowingly transport, receive, possess and purchase contraband cigarettes, as that term is defined in 18 U.S.C. § 2341 to wit, approximately 201,000 cigarettes which bore no evidence of the payment of applicable state cigarette taxes in the State of West Virginia.

In violation of Title 18, United States Code, Sections 2342(a) and 2.

COUNT TWELVE

On or about November 30, 2010 at or near Huntington, Cabell County, West Virginia, within the Southern District of West Virginia and elsewhere, defendants NASSER SAID SALEH, also known as "Nasser Said Daher" and BASIM ALI TALOUZI aided and abetted by each other and by persons both known and unknown to the grand jury did knowingly transport, receive, possess and purchase contraband cigarettes, as that term is defined in 18 U.S.C. § 2341 to wit, approximately 178,000 cigarettes which bore no evidence of the payment of applicable state cigarette taxes in the State of West Virginia.

In violation of Title 18, United States Code, Sections 2342(a) and 2.

COUNT THIRTEEN

On or about December 2, 2010 at or near Huntington, Cabell County, West Virginia, within the Southern District of West Virginia and elsewhere, defendants BASIM ALI TALOUZI, JAMAL ADIL MAKHLOUF, FODIE MANDA KOITA and YAHYA WILLIA, aided and abetted by each other and by persons both known and unknown to the grand jury, did knowingly transport, receive, possess, purchase and cause the transportation, receipt, possession and purchase of contraband cigarettes as that term is defined in 18 U.S.C., § 2341, to wit, a quantity of approximately 180,000 cigarettes which bore no evidence of the payment of applicable state cigarette taxes in the State of West Virginia.

In violation of Title 18, United States Code, Sections 2342(a) and 2.

COUNT FOURTEEN

On or about December 6, 2010 at or near Huntington, Cabell County, West Virginia, within the Southern District of West Virginia and elsewhere, defendants NASSER SAID SALEH, also known as "Nasser Said Daher", BASIM ALI TALOUZI and NICOLE DIANNE BLANKENSHIP aided and abetted by each other and by persons both known and unknown to the grand jury did knowingly transport, receive, possess and purchase contraband cigarettes, as that term is defined in 18 U.S.C. § 2341 to wit, approximately 228,000 cigarettes which bore no evidence of the payment of applicable state cigarette taxes in the State of West Virginia.

In violation of Title 18, United States Code, Sections 2342(a) and 2.

COUNT FIFTEEN

On or about December 10, 2010 at or near Huntington, Cabell County, West Virginia, within the Southern District of West Virginia and elsewhere, defendants NASSER SAID SALEH, also known as "Nasser Said Daher", BASIM ALI TALOUZI and NICOLE DIANNE BLANKENSHIP aided and abetted by each other and by persons both known and unknown to the grand jury did knowingly transport, receive, possess and purchase contraband cigarettes, as that term is defined in 18 U.S.C. § 2341 to wit, approximately 133,000 cigarettes which bore no evidence of the payment of applicable state cigarette taxes in the State of West Virginia.

In violation of Title 18, United States Code, Sections 2342(a) and 2.

COUNT SIXTEEN

On or about December 20, 2010 at or near Huntington, Cabell County, West Virginia, within the Southern District of West Virginia and elsewhere, defendants BASIM ALI TALOUZI, NICOLE DIANNE BLANKENSHIP, JAMAL ADIL MAKHLOUF, FODIE MANDA KOITA and YAHYA WILLIA, aided and abetted by each other and by persons both known and unknown to the grand jury, did knowingly transport, receive, possess, purchase and cause the transportation, receipt, possession and purchase of contraband cigarettes as that term is defined in 18 U.S.C., § 2341, to wit, a quantity of approximately 288,000 cigarettes which bore no evidence of the payment of applicable state cigarette taxes in the State of West Virginia.

In violation of Title 18, United States Code, Sections 2342(a) and 2.

COUNT SEVENTEEN

On or about December 29, 2010 at or near Huntington, Cabell County, West Virginia, within the Southern District of West Virginia and elsewhere, defendants NASSER SAID SALEH, also known as "Nasser Said Daher", BASIM ALI TALOUZI and NICOLE DIANNE BLANKENSHIP aided and abetted by each other and by persons both known and unknown to the grand jury did knowingly transport, receive, possess and purchase contraband cigarettes, as that term is defined in 18 U.S.C. § 2341 to wit, approximately 204,000 cigarettes which bore no evidence of the payment of applicable state cigarette taxes in the State of West Virginia.

In violation of Title 18, United States Code, Sections 2342(a) and 2.

COUNT EIGHTEEN

On or about January 5, 2011 at or near Huntington, Cabell County, West Virginia, within the Southern District of West Virginia and elsewhere, defendants NASSER SAID SALEH, also known as "Nasser Said Daher", BASIM ALI TALOUZI and NICOLE DIANNE BLANKENSHIP aided and abetted by each other and by persons both known and unknown to the grand jury did knowingly transport, receive, possess and purchase contraband cigarettes, as that term is defined in 18 U.S.C. § 2341 to wit, approximately 180,000 cigarettes which bore no evidence of the payment of applicable state cigarette taxes in the State of West Virginia.

In violation of Title 18, United States Code, Sections 2342(a) and 2.

COUNT NINETEEN

On or about July 30, 2010, at or near Huntington, Cabell County, West Virginia, and within the Southern District of West Virginia, defendant BASIM TALOUZI knowingly and intentionally distributed a quantity of oxycodone, also known as "OxyContin," a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY

On or about August 13, 2010, at or near Huntington, Cabell County, West Virginia, and within the Southern District of West Virginia, defendant BASIM TALOUZI knowingly and intentionally distributed a quantity of oxycodone, also known as "OxyContin," a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-ONE

On or about August 17, 2010, at or near Huntington, Cabell County, West Virginia, and within the Southern District of West Virginia, defendant BASIM TALOUZI knowingly and intentionally distributed a quantity of oxycodone, also known as "OxyContin," a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-TWO

On or about August 24, 2010, at or near Huntington, Cabell County, West Virginia, and within the Southern District of West Virginia, defendant BASIM TALOUZI knowingly and intentionally distributed a quantity of oxycodone, also known as "OxyContin," a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-THREE

On or about September 14, 2010, at or near Huntington, Cabell County, West Virginia, and within the Southern District of West Virginia, defendants BASIM TALOUZI and NICOLE DIANNE BLANKENSHIP, aided and abetted by each other, knowingly and intentionally distributed a quantity of oxycodone, also known as "OxyContin," a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT TWENTY-FOUR

On or about October 7, 2010, at or near Huntington, Cabell County, West Virginia, and within the Southern District of West Virginia, defendants BASIM TALOUZI and NICOLE DIANNE BLANKENSHIP, aided and abetted by each other, knowingly and intentionally distributed a quantity of oxycodone, also known as "Mbox 30s," a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

R. BOOTH GOODWIN II
United States Attorney

By:



CHARLES T. MILLER
Assistant United States Attorney